FILED

NOV 1 2 2015

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. WILLIAM E. SEAGO, Defendant.	)	No. 4:15CR515 RWS/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C.§ 2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about July 1, 2012, and on or about February 5, 2013, within the Eastern District of Missouri and elsewhere,

WILLIAM E. SEAGO,

the defendant herein, did knowingly possess material that contained images and videos of child pornography that was produced using materials that traveled in interstate commerce, to wit, an E-Machine Computer containing a Seagate hard drive that was produced outside Missouri and therefore has traveled in interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to the following:

1. !!!cim (pthc)sucknew(awesome cumshot).avi, which is a video file depicting a prepubescent minor female performing oral sex on a male;

2. (2)(2)(2)(2).mpg, which is a video file depicting a minor female engaged in sexual intercourse with a male; and

3. (pthc-jho-lolifuck) 10 yo Katrina – pussy cumshot (sound)(2)(2).wmv, which is a video file depicting a male touching the genitals of a prepubescent minor female and ejaculating on her;

In violation of Title 18, United States Code, Sections 2252A (a)(5)(B) and (b)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about July 1, 2012, and on or about February 5, 2013, within the Eastern District of Missouri and elsewhere,

WILLIAM E. SEAGO,

the defendant herein, did knowingly possess material that contained images and videos of child pornography that was produced using materials that traveled in interstate commerce, to wit, an HP Computer containing a Maxtor hard drive that was produced outside Missouri and therefore has traveled in interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to the following:

1. 00387_0.JPG, which is a graphic image file depicting a male engaged in sexual intercourse with a minor female;

2. 00395_0.JPG, which is a graphic image file depicting a minor female in lascivious display of her genitals; and

3. !!!new!!! (pthc) linda – a little extra217207.avi, which is a video file depicting a prepubescent minor female engaging in oral sex with a male;

In violation of Title 18, United States Code, Sections 2252A (a)(5)(B) and (b)(2).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about July 1, 2012, and on or about February 5, 2013, within the Eastern District of Missouri and elsewhere,

WILLIAM E. SEAGO,

the defendant herein, did knowingly possess material that contained images and videos of child pornography that was produced using materials that traveled in interstate commerce, to wit, a Seagate external hard drive that was produced outside Missouri and therefore has traveled in interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to the following:

1. (pthc) linda 2 true cum swallow.avi, which is a video file depicting a prepubescent minor female performing oral sex on a male; and

2. ___ARESTRA___! New ! (pthc) veronica Nuevo 2 nenas_all(2).mpg, which is a video file of two minor females, of which one is a prepubescent minor female, in lascivious display of their genitals and sticking an object in their genitals;

In violation of Title 18, United States Code, Sections 2252A (a)(5)(B) and (b)(2).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

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